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3/20/25
CENTRAL DISTRICT OF CALIFORNIA
BY <u>MRV</u> DEPUTY
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Plaintiff In Propria Persona

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

BARRY W. ROSEN,

| CASE NO.: 2:25-cv-02528-ODW(PDx)

Plaintiff,

**COMPLAINT FOR COPYRIGHT
INFRINGEMENT (INJUNCTIVE RELIEF
DEMANDED)**

v.
POSTERTHEPEOPLE.COM,
CELEBPOSTER.COM
POSTERS555.COM;
ICEPOSTER.COM,
IDPOSTER.COM,
FCCARINO.COM,
NPOSTER.COM,
DREAM PRINTS, INC.
ANDRIY BONDARENKO, a
inclusive.

Demand for Jury Trial

Defendants.

Plaintiff BARRY W. ROSEN acting in Propria Persona, brings this Complaint against Defendants DREAM PRINTS, INC, ANDRIY BONDARENKO AND DOES 1-10, believed to be the owners/operators of the apparently related websites posterthepeople.com, celebposter.com, posters555.com, iceposter.com, idposter.com, fccarino.com nposter.com, and other websites yet to be identified which offer posters and other goods such as t-shirts, mugs etc., featuring predominantly images of celebrities damages and injunctive relief for willful direct copyright infringement, and in support thereof states as follows:

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SUMMARY OF THE ACTION

1. Plaintiff BARRY W. ROSEN ("Plaintiff" or "Rosen") brings this action for violations of exclusive rights under the Copyright Act, 17 U.S.C. § 106, to copy and distribute Rosen's original copyrighted works of authorship ("the Works").

2. Plaintiff has been a professional photographer for over 40 years creating distinguished works. Over that time, he has produced photos for numerous large advertisers including a number of beer companies, sunglass makers, along with ski, fashion, jewelry and others. Rosen has created album covers for record companies, produced numerous calendars, and famous posters that have been distributed worldwide, as well as produced editorials for magazines and newspapers featuring famous celebrities, models and sports stars. He has been featured on tv shows such as Extra, Entertainment Tonight, and Access Hollywood.

3. Defendant POSTERTHEPEOPLE.COM is an internet website offering custom made/printed posters and other items featuring photos of various celebrities, models, and athletes. Plaintiff is informed and believes that the Website domain has been registered with internet domain registrar using false information and then covered up that false information using a domain privacy provider. Plaintiff is aware that Raymond Johnson is listed as the owner of the domain, which is hidden by a privacy protection service owned by GoDaddy, however, Plaintiff believes that the actual owner may be Dream Prints, Inc. and Andriy Bondarenko and is using the Johnson name as false alias based on the overall circumstances and an ongoing pattern of using false names, corporations and addresses to hide the real owners identities. POSTERTHEPEOPLE.COM is currently or has infringing up to 100 separate copies of Plaintiff's photographic images. This website also uses a service called Cloudflare to hide the true identity both its owner and of its true hosting provider in order to interfere and stifle attempts to send DMCA takedown notices.

4. Defendant CELEBPOSTER.COM is an internet website offering custom made/printed posters and other items featuring photos of various celebrities, models, and athletes. Plaintiff is informed and believes that the Website domain has been registered with internet domain registrar using false information and then covered up that false information using a domain privacy provider in an ongoing pattern of using false names, corporations and addresses to hide the real

1 owners identities. CELEBPOSTER.COM is currently or has been infringing up to forty-three
2 separate copies of Plaintiff's photographic images and overall has infringed up to 108 separate
3 copies of Plaintiff's photographic images. Plaintiff is aware that Andriy Bondarenko is listed as the
4 owner of the domain, which is hidden by a privacy protection service. This website also uses a
5 service called Cloudflare to hide the true identity both its owner and of its true hosting provider in
6 order to interfere and stifle attempts to send DMCA takedown notices.

7 5. Defendant POSTERS555.COM is an internet website offering custom made/printed
8 posters and other items featuring photos of various celebrities, models, and athletes. Plaintiff is
9 informed and believes that the Website domain has been registered with internet domain registrar
10 using false information and then covered up that false information using a domain privacy provider.
11 Plaintiff is aware that POSTERS555.COM is currently or has been infringing up to seventy-nine
12 separate copies of Plaintiff's photographic images by virtue of the fact that the seventy-nine were
13 willfully reposted after having previously been taken down overall has infringed up to ninety-nine
14 separate copies of Plaintiff's photographic images. Plaintiff is aware that Dream Prints, Inc. and/or
15 Andriy Bondarenko is the likely owner of the domain or is using an alias that is hidden by a privacy
16 protection service and is directly associated with ICEPOSTER.COM. This website also uses a
17 service called Cloudflare to hide the true identity both its owner and of its true hosting provider in
18 order to interfere and stifle attempts to send DMCA takedown notices.

19 6. Defendant ICEPOSTER.COM is an internet website offering custom made/printed
20 posters and other items featuring photos of various celebrities, models, and athletes. Plaintiff is
21 informed and believes that the Website domain has been registered with internet domain registrar
22 using false information and then covered up that false information using a domain privacy provider.
23 Plaintiff is informed and believes that the Website domain has been registered with internet domain
24 registrar using false information and then covered up that false information using a domain privacy
25 provider. Plaintiff is aware that Dream Prints, Inc. and/or Andriy Bondarenko is likely the real owner
26 of the domain or is using an alias that is hidden by a privacy protection service. Plaintiff is aware
27 that ICEPOSTER.COM has infringed or is infringing up to 106 separate copies of Plaintiff's
28 photographic images. Dream Prints, Inc. and Andriy Bondarenko were previously sued for operation

1 of the ICEPOSTER.COM domain in the Central District of California, which resulted in a 2008
2 settlement agreement which has been purposefully breached.

3 7. Defendant IDPOSTER.COM is an internet website offering custom made/printed
4 posters and other items featuring photos of various celebrities, models, and athletes.
5 IDPOSTER.COM has been or is currently infringing up to seventy-four separate copies of Plaintiff's
6 photographic images. Plaintiff is informed and believes that the Website domain has been registered
7 with internet domain registrar using false information and then covered up that false information
8 using a domain privacy provider. Plaintiff is aware that a false name, Steve Simon is or has been
9 listed as the owner of the domain, which is hidden by a privacy protection service, however, Plaintiff
10 believes that the actual owner may be Dream Prints, Inc. and/or Andriy Bondarenko using an alias.
11 This website also currently uses a service called Cloudflare that hides the identity of its true hosting
12 provider. Plaintiff is aware that IDPOSTER.COM is currently infringing up to 100 separate copies of
13 Plaintiff's photographic images by the 100 were reposted after having previously been taken down.

14 8. Defendant FCCARINO.COM is an internet website offering custom made/printed
15 posters and other items featuring photos of various celebrities, models, and athletes. Plaintiff is
16 informed and believes that the Website domain has been registered with internet domain registrar
17 using false information and then covered up that false information using a domain privacy provider.
18 Plaintiff believes that the actual owner may have been Dream Prints, Inc. and/or Andriy Bondarenko
19 using an alias, which is hidden by a privacy protection service and the domain/website is directly
20 related to POSTERTHEPEOPLE.COM. FCCARINO.COM is currently or has been infringing up to
21 100 separate copies of Plaintiff's photographic images. This website also uses a service called
22 Cloudflare to hide the true identity both its owner and of its true hosting provider in order to interfere
23 and stifle attempts to send DMCA takedown notices.

24 9. Defendant NPOSTER.COM was an internet website offering custom made/printed
25 posters and other items featuring photos of various celebrities, models, and athletes. Plaintiff is
26 informed and believes that the Website domain was registered with internet domain registrar using
27 false information and then covered up that false information using a domain privacy provider.
28 Plaintiff is aware that the website was shut down and the domain was sold. Plaintiff is aware that

1 Ohad Shapira and/or Steve Simon was listed as the owner/operator of the domain/website, which
2 was hidden by a privacy protection service. Plaintiff believes that the actual owner may have been
3 Dream Prints, Inc. and/or Andriy Bondarenko using an alias. The domain has been sold and the
4 website is no longer in operation. Plaintiff is aware that IDPOSTER.COM was infringing up to fifty-
5 one separate copies of Plaintiff's photographic images.

6 10. Defendant Dream Prints, Inc. is a corporation that is/was operated out of Nevada
7 when it was previously sued in 2008 for copyright infringement by Plaintiff and which was operated
8 at the time by Andrey Bondarenko, Leonid Ryzhenko and Mykhaylo Perebiynis, Larry Vunik,
9 Vasiliy Leonov, and Isaac Nihelson. Dream Prints, Inc. appears to currently be operated out of both
10 Nevada and Wyoming, by same individuals, including Bondarenko and Ryzhenko who previously
11 operated the corporation and who appear to be actually be located in Northern California. Dream
12 Prints, Inc. and Andriy Bondarenko were previously sued for operation of the ICEPOSTER.COM
13 domain in the Central District of California, which resulted in a 2008 settlement agreement which
14 has been purposefully breached.

15 11. Defendant Andriy Bondarenko ("Bondarenko") is an individual of Ukrainian descent,
16 who Plaintiff believes now resides in Northern California in the San Francisco bay area. Bondarenko
17 has a long history of using or providing false names, addresses and other information in order to
18 register various domain names and to procure webhosting services in order to be able to operate his
19 various businesses, which predominantly consist of offering for sale or selling posters featuring
20 photographs of well-known United States and California based celebrities, models and sports stars
21 and other related goods featuring such same photographs such as puzzles, mousepads, t-shirts and
22 pillows. Plaintiff is aware that Bondarenko has predominantly used false addresses in Ukraine and
23 Israel as well as in California, Nevada, Wyoming and New Mexico to name a few (although is a
24 California resident). At all times relevant herein, BONDARENKO owned and operated multiple
25 internet websites offering principally posters, along with other goods such as mousepads and
26 puzzles, etc. These websites currently utilize multiple domain names located at the URL's
27 posterthepeople.com ("posterpeople"), celebposter.com ("celebposter"), posters555.com
28 ("posters555"), iceposter.com ("iceposter"), idposter.com ("idposter"), fccarino.com ("FC Carino")

1 and also formally operated nposter.com (“nposter”) collectively (“BONWEBSITES”). Plaintiff is
2 aware that Bondarenko has owned or owns multiple other related domains/websites including but
3 not limited to imagesyoulike.com, printceleb.com, sport-poster.com.

4 12. Plaintiff has been able to identify that at least 100 separate infringements at issue on
5 posterthepeople.com which are also related to the website idposter.com and is aware of information
6 that links the infringing activities on all BONWEBSITES together, which the principal majority are
7 the same copies of Plaintiff’s photographic images used across all of the BONWEBSITES. In all,
8 Plaintiff has been able to identify at least 149 separate infringements at issue across all of the
9 BONWEBSITES.

10 13. Upon information and belief, Steve Simon (“Simon”) and Ohad Shapira (“Shapira”)
11 are individuals located somewhere in the United States and are likely aliases for Bonderenko.

12 14. Plaintiff is aware that Simon has used addresses in the United States, Italy, and
13 Ukraine. At all times relevant herein, Simon has owned and operated the internet website located at
14 the URL idposter.com (“idposter”). At all times relevant herein, Shapira has owned and operated the
15 internet website located at the URL nposter.com (“nposter”). Plaintiff is informed and believes that
16 the idposter.com, nposter.com domains were operated under false identities including Steve Simon
17 and Ohad Shapira.

18 15. Plaintiff is informed and believes that Bondarenko, a former Ukrainian, who is and
19 during all relevant times has been a resident of Northern California is the owner/operator and in
20 control of the BONWEBSITES and has been or is directly infringing Plaintiff’s Photographs by
21 scanning, uploading, offering for sale or selling copies of, and publicly displaying the infringing
22 images on BONWEBSITES. Plaintiff is informed and believes that the infringements at issue in this
23 case were both willful Copyright infringements and are in material breach of a confidential
24 settlement agreement to which Andriy Bondarenko entered into in the Central District of California.

25 16. Defendants RELIABLESITE.NET LLC, POSTERTHEPEOPLE.COM,
26 CELEBPOSTER.COM, POSTERS555.COM, ICEPOSTER.COM, IDPOSTER.COM,
27 NPOSTER.COM, RAYMOND JOHNSON and ANDRIY BONDARENKO are collectively referred
28 to herein as “Defendants.”

17. Defendants POSTERTHEPEOPLE.COM, CELEBPOSTER.COM, POSTERS555.COM, ICEPOSTER.COM, IDPOSTER.COM, NPOSTER.COM, RAYMOND JOHNSON and ANDRIY BONDARENKO are collectively referred to herein as “Non-Reliable Defendants.”

18. Plaintiff does not presently know the true names and capacities of any other Defendants that may have been involved or partnered with Bondarenko or are involved with Dream Prints, Inc. in connection with the infringements as their whois ownership is currently or was obscured by privacy protection services or aliases but reserves the right to amend to add such parties. but reserves the right to amend to add such parties and currently identifies such persons as Does 1-10.

DEFENDANTS

19. Dream Prints, Inc. is currently either a Nevada or Wyoming corporation, but was a Nevada corporation when previously sued by Plaintiff in 2008, but which appears to be operated out of northern California by California residents.

20. Andriy Bondarenko, a California resident, is an individual believed to be residing in northern California, but Plaintiff has been unable to locate an exact address.

21. DOES 1 through 10, inclusive, are unknown to Plaintiff, who therefore sues said Defendants by such fictitious names. Plaintiff will ask leave of Court to amend this Complaint and insert the true names and capacities of said Defendants when the same have been ascertained. Plaintiff is informed and believes and, upon such, alleges that each of the Defendants designated herein as a "DOE" is legally responsible in some manner for the events and happenings herein alleged, and that Plaintiff's damages as alleged herein were proximately caused by such Defendants.

JURISDICTION AND VENUE

22. This is an action arising under the Copyright Act, 17 U.S.C. § 501.

23. This Court has subject matter jurisdiction over these claims pursuant to 28 U.S.C. §§ 1331, 1338(a).

24. Defendants are subject to personal jurisdiction in California as they are either California residents, registered to do and/or regularly conduct business in the State of California.

25. Venue is proper in this district under 28 U.S.C. § 1391(b) and (c) and 1400(a) because the events giving rise to the claims occurred in this district, Defendants engaged in infringement in this district, Defendants resides in this district, and Defendants are subject to personal jurisdiction in this district.

INFRINGEMENT BY DEFENDANTS

26. Rosen alleges that Rosen first learned of the infringing activities on the BONWEBSITES within the last three (3) years and reported the infringements to the various hosting providers. In response, infringements were either partially or fully removed from BONWEBSITES. Thereafter, the majority of the BONWEBSITES moved to new hosting providers and reposted many of the infringing activities. The websites were moved as many of the new hosting providers are located in countries where DMCA notifications are either not honored or that they specifically thumb their noses at intellectual property owners and DMCA takedown procedures. Thereafter the BONWEBSITES started using Cloudflare to also obscure the hosting provider. The owner information for all the BONWEBSITES is also obscured by privacy protection services. Rosen's photographs registered under various registration numbers with US Copyright office as provided in **Exhibit A** to this complaint. Rosen notes that the posterthepeople.com infringements utilize the same product numbers and numbering scheme for the items as those on idposter.com with the first letters in a different order (i.e., PDI772440 for posterthepeople.com and IDP772440 for idposter.com). Moreover, many of the BONWEBSITES are or were hosted on the same servers showing the relationship between them.

27. Plaintiff is informed and believes that Dream Prints, Inc. and Andriy Bondarenko have a long history of using or providing false names, addresses and other information in order to register domain names and procure webhosting services in order to be able to operate his various businesses, which predominantly consist of offering for sale or selling posters featuring photographs of well-known United States and California based celebrities, models and sports stars and other related goods featuring such same photographs such as puzzles, mousepads, t-shirts and pillows. Plaintiff is aware that Bondarenko has used false addresses Wyoming, New Mexico, Nevada, Florida

1 and New York along with in Ukraine and Israel as well as numerous addresses in Northern
2 California (although is a California resident).

3 28. Plaintiff is informed and believes that Dream Prints, Inc and Andriy Bondarenko, a
4 former Ukrainian, who is and during all relevant times has been a resident of California are the
5 owner/operator(s) and in control of all of the websites using the domain names, celebposter.com,
6 posters555.com, iceposter.com, as well as idposter.com, fccarino.com and nposter.com to which
7 have/are directly infringing Plaintiff's Photographs by scanning, uploading, offer for sale, and
8 publicly displaying the infringing images. Plaintiff is informed and believes that the infringements at
9 issue in this case on celebposter.com, idposter.com, and nposter.com were both willful Copyright
10 infringements and in material breach of a settlement agreement to which Dream Prints, Inc Andriy
11 Bondarenko entered into in the Central District of California.

12 29. Dream Prints, Inc and Bondarenko is using multiple alias's to operate the
13 BONWEBSITES in a deliberate attempt to hide true identities.

14 30. Rosen alleges that he sent notices to the various hosting providers for the various
15 websites at issue (posterthepeople.com, celebposter.com, posters555.com, iceposter.com,
16 idposter.com and nposter.com) operated by Dream Prints, Inc and Andriy Bondarenko and that
17 defendants continued to willfully engage in infringing activities thereafter. Rosen alleges that the
18 infringing activities by Dream Prints, Inc., Andriy Bondarenko and the other defendants on the
19 various websites at issue (posterthepeople.com, celebposter.com, posters555.com, iceposter.com,
20 idposter.com and nposter.com), were knowingly willful due to the posting, reposting and/or failures
21 to remove the photographic images listed in **Exhibit A**, which they infringe on Plaintiff's copyrights.

22 31. Rosen only recently learned about the fccarino.com website and believes there may
23 be more such website.

24 32. Rosen does not yet know the true identities of any other of the other actual infringing
25 users but currently has reason to believe that discovery will demonstrate that said infringers will both
26 willful repeat infringers, who are also in material breach of a previous settlement agreement in the
27 2008 action in the Central District of California. Rosen reserves the right to amend to add said
28 infringing users once their actual identities become known.

1 33. Rosen created the photographic works at issue in this case identified collectively as
2 the “Photographs.” The Photographs consist of up to a maximum of 149 different registered images
3 (and some repeat usage) and consist of material original to Plaintiff and is copyrightable subject
4 matter that are currently subject to ongoing active infringement. Plaintiff is the owner of all rights,
5 title, and interest in the Photographs.

6 34. Within the last three years, Plaintiff discovered that the Defendants unlawfully
7 copied, publicly displayed, uploaded/downloaded, distributed, and sold unauthorized copies of the
8 Photographs, constituting direct copyright infringement, pursuant to sections 106 and 501 of the
9 Copyright Act (17 U.S.C section 106 and 501).

10 35. Plaintiff is informed and believes that the Defendants, without authorization or
11 permission from Plaintiff, unlawfully and willfully copied/reproduced, uploaded/downloaded,
12 caused to be uploaded/downloaded, publicly displayed, distributed, attempted to sell, and sold the
13 Photographs to a global audience on the World Wide Web.

14 36. Dream Prints Inc., and Bondarenko were previously the subject to a Copyright
15 lawsuit by Plaintiff in the Central District of California in 2008, which was settled. Dream Prints
16 Inc., and Bondarenko is in material breach of that settlement agreement and thus the infringing
17 activities at issue are knowingly willful.

18 37. Defendants have never been licensed to use the Works at issue in this action for any
19 purpose.

20 38. On a date after the Works at issue in this action were created, but prior to filing of this
21 action, Defendants copied the Works.

22 39. Defendants copied Rosen’s copyrighted Works without Rosen’s permission.

23 40. Rosen’s Works are protected by copyright but are not otherwise confidential,
24 proprietary, or trade secrets.

25 41. Rosen never gave Defendants permission or authority to copy, distribute or display
26 the Works at issue in this case.

THE COPYRIGHTED WORKS AT ISSUE

42. The table detailing the overall Copyright Titles, Registration Numbers of the works of intellectual property at issue in this case, which are referred to herein as the “Works” or “Photographs” are attached hereto and marked **Exhibit A**.

43. At all relevant times Rosen was the owner of the copyrighted Works at issue in this case.

COUNT I

DIRECT COPYRIGHT INFRINGEMENT BY ALL DEFENDANTS

44. Rosen incorporates the allegations of paragraphs 1 through 43 of this Complaint as if fully set forth herein.

45. Rosen owns valid copyrights in the Works at issue in this case.

46. Rosen registered the Works at issue in this case with the Register of Copyrights pursuant to 17 U.S.C. § 411(a).

47. Defendants copied, displayed, and distributed the Works at issue in this case and made derivatives of the Works without Rosen's authorization in violation of 17 U.S.C. § 501.

48. Defendants performed the acts alleged in the course and scope of its business activities.

49. Defendants' acts were willful.

50. Reliable Defendants do not qualify for any DMCA safe harbor for failures to comply with the requirements of the DMCA including failures to take down in response to notifications, failures to adopt and implement repeat infringer policies and failures to publish such policies and failure to register a DMCA agent with the copyright office.

51. Rosen has been damaged.

52. The harm caused to Rosen has been irreparable.

COUNT II

VICARIOUS COPYRIGHT INFRINGEMENT BY ALL DEFENDANTS

53. Rosen incorporates the allegations of paragraphs 1 through 52 of this Complaint as if fully set forth herein.

1 54. Rosen owns valid copyrights in the Works at issue in this case.

2 55. Rosen registered the Works at issue in this case with the Register of Copyrights
3 pursuant to 17 U.S.C. § 411(a).

4 56. Defendants copied, displayed, and distributed the Works at issue in this case and
5 made derivatives of the Works without Rosen's authorization in violation of 17 U.S.C. § 501.

6 57. Defendants had a direct financial interest in the infringing activities alleged herein.

7 58. As a result of Defendants vicarious infringement as alleged above, Defendants
8 obtained direct and indirect profits it would otherwise not have realized but for its infringements of
9 the Works.

10 59. Defendants have continued to copy, display, and distribute the Works at issue with
11 knowledge that such acts violate Rosen's intellectual property rights.

12 60. Reliable's acts were willful.

13 61. Rosen has been damaged.

14 62. The harm caused to Rosen has been irreparable.

15 **COUNT III**

16 **WILLFUL INFRINGEMENT BY DEFENDANTS**

17 63. Rosen incorporates the allegations of paragraphs 1 through 62 of this Complaint as if
18 fully set forth herein.

19 64. Rosen owns valid copyrights in the Works at issue in this case.

20 65. Rosen registered the Works at issue in this case with the Register of Copyrights
21 pursuant to 17 U.S.C. § 411(a).

22 66. Defendants directly deliberately knowingly and willfully copied, displayed, and
23 distributed the Works at issue in this case and made derivatives of the Works without Rosen's
24 authorization in violation of 17 U.S.C. § 501 for the purpose of profiting off the use of the Works on
25 the BONWEBSITES.

26 67. Defendants specifically knew or had reason to know of the direct infringing activity
27 as Rosen had engaged in previous litigation against Non-Reliable Defendants and they were subject
28

to a settlement agreement in which they had specifically agreed to never infringe any of Rosen's Works ever again.

68. Defendants willfully breached the terms of the settlement agreement and thereby infringed on Rosen's Works by posting them on the BONWEBSITES.

69. Defendants were on notice of the infringing activity and thereafter directly infringed on Rosen's Works by continuing to use them, by posting them or reposting them on the BONWEBSITES.

70. Rosen is informed and believes that Defendants have continually engaged in a pattern of purposeful, reckless, and willful direct infringement of Rosen's Works via numerous websites/domains, including on the BONWEBSITES and will continue to do so unless permanently enjoined, along with seizure of all domain names, servers, etc.

71. Rosen has been damaged.

72. The harm caused to Rosen has been irreparable.

COUNT IV

504(c)(3) WILLFUL INFRINGEMENT BY DEFENDANTS

73. Rosen incorporates the allegations of paragraphs 1 through 72 of this Complaint as if fully set forth herein.

74. Rosen owns valid copyrights in the Works at issue in this case.

75. Rosen registered the Works at issue in this case with the Register of Copyrights pursuant to 17 U.S.C. § 411(a).

76. Defendants directly deliberately knowingly and willfully copied, displayed, and distributed the Works at issue in this case and made derivatives of the Works without Rosen's authorization in violation of 17 U.S.C. § 501 for the purpose of profiting off the use of the Works on the BONWEBSITES.

77. The actions of Defendants in operating the BONWEBSITES, were willful as Non-Reliable Defendants or a person or persons acting in concert with the Defendants, knowingly provided or knowingly caused to be provided materially false contact information to a domain name registrar, domain name registry, or other domain name registration authority in registering,

1 maintaining, or renewing a domain name used in connection with the infringing activities on the
2 BONWEBSITES in violation of 17 U.S.C. § 504(c)(3).

3 78. The actions of Defendants in operating the BONWEBSITES, knowingly provided or
4 knowingly caused to be provided materially false contact information to a domain name registrar,
5 domain name registry, or other domain name registration authority in registering, maintaining, or
6 renewing a domain name used in connection with the infringing activities on the BONWEBSITES
7 by utilizing domain name proxy services in order to hide/mask the real domain owner (or false
8 domain information) identities in violation of 17 U.S.C. § 504(c)(3).

9 79. Rosen is informed and believes that Defendants have continually engaged in a
10 purposeful pattern of utilizing either domain name proxy services in order to hide/mask the real
11 domain owner (or false domain information) or otherwise providing materially false contact
12 information to a domain name registrar, domain name registry, or other domain name registration
13 authority in registering, maintaining, or renewing a domain name used in connection with the
14 infringing activities on the BONWEBSITES in violation of 17 U.S.C. § 504(c)(3).

15 80. Defendants acts were willful.

16 81. Rosen has been damaged.

17 82. The harm caused to Rosen has been irreparable.

18 WHEREFORE, the Plaintiff prays for judgment against the Defendants that:

19 a. Defendants and its officers, agents, servants, employees, affiliated entities, and all of
20 those in active concert with them, be preliminarily and permanently enjoined from committing the
21 acts alleged herein in violation of 17 U.S.C. § 501;

22 b. Defendants domains, servers, IP Addresses, networks or other hardware used as part
23 of the infringing activities by seized, etc.;

24 c. Defendants be required to pay Plaintiff his actual damages and Defendant's profits
25 attributable to the infringement, or, at Plaintiff's election, statutory damages, as provided in 17
26 U.S.C. § 504;

27 d. Plaintiff be awarded his attorneys' fees and costs of suit under the applicable statutes
28 sued upon;

1 e. Plaintiff be awarded such other and further relief as the Court deems just and proper;
2 and

3 f. Plaintiff be awarded pre- and post-judgment interest.

4 **JURY DEMAND**

5 Plaintiff Barry W. Rosen hereby demands a trial by jury of all issues so triable.
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7 DATED: March 20, 2025

8 Respectfully submitted,
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11 BARRY W. ROSEN
12 Plaintiff In Propria Persona
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Exhibit A

Website: posterthepeople.com

Gena Lee Nolin

VAu653-334	Gena Nolin (Home)
VA 1-230-933	Published Works 2000 Pt 1
VA 1-230-933	Published Works 2000 Pt 1
VA 1-230-933	Published Works 2000 Pt 1
VA 1-230-937	Published Works 1996 Pt 1
VA 1-230-922	Published Works 1999 Pt 1
VA 1-231-145	Gena Lee Nolin 31

Alison Eastwood

VA 1-231-031	Published Works 1997 Pt 1
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Joanna Krupa

VA 1-230-923	Published Works 2002 Pt 1
VA 1-230-923	Published Works 2002 Pt 1
VA 1-230-923	Published Works 2002 Pt 1

Sofia Vergara

VAu660-266	Sofia Vergara
VAu001514823	Sofia Vergara Unpub 2

Charisma Carpenter

VA 1-231-030	Published Works 1998 Pt 1
VAu660-265	Charisma Carpenter

Jeri Ryan

VAu660-267	Jeri Ryan
VAu660-267	Jeri Ryan
VAu660-267	Jeri Ryan

VAu660-267	Jeri Ryan
VA 1-231-030	Published Works 1998 Pt 1
VA 1-231-031	Published Works 1997 Pt 1

Eleniak

VAu692-231	Erika Eleniak
VAu001514820	Erika Eleniak Unpub 2

Tuite

VAu692-302	Gabrielle Tuite
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-230-934	Published Works 2003 Pt 1

Ali Landry

VAu660-263	Ali Landry
VA 1-230-922	Published Works 1999 Pt 1
VA 1-231-030	Published Works 1998 Pt 1

VA 1-230-933	Published Works 2000 Pt 1
VA 1-230-933	Published Works 2000 Pt 1

Sonia Vera	
VAu692-225	Sonia Vera

Daisy Fuentes

VAu692-230	Daisy Fuentes
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2

Website: celebposter.com

Eleniak

VAu692-231	Erika Eleniak
VAu001514820	Erika Eleniak Unpub 2

Tuite

VAu692-302	Gabrielle Tuite
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-230-934	Published Works 2003 Pt 1

Angela Taylor

VA 1-230-934	Published Works 2003 Pt 1
VAu692-306	Angela Taylor

Charisma Carpenter

VA 1-231-030 Published Works 1998 Pt 1
VAu660-265 Charisma Carpenter

Ali Landry
VAu660-263 Ali Landry
VA 1-230-922 Published Works 1999 Pt 1
VA 1-230-933 Published Works 2000 Pt 1

Sonia Vera
VAu692-225 Sonia Vera
VAu692-225 Sonia Vera

Jeri Ryan
VA 1-231-030 Published Works 1998 Pt 1
VAu660-267 Jeri Ryan
VAu660-267 Jeri Ryan
VAu660-267 Jeri Ryan
VAu660-267 Jeri Ryan
VAu660-267 Jeri Ryan

Gena Lee Nolin
VAu653-334 Gena Nolin (Home)
VAu653-334 Gena Nolin (Home)
VAu653-334 Gena Nolin (Home)
VAu653-334 Gena Nolin (Home)
VA 1-230-933 Published Works 2000 Pt 1
VA 1-230-933 Published Works 2000 Pt 1
VA 1-230-933 Published Works 2000 Pt 1
VA 1-230-937 Published Works 1996 Pt 1
VA 1-230-922 Published Works 1999 Pt 1

VA 1-231-145

Gena Lee Nolin 31

Amy Weber

VA 1-230-923

Published Works 2002 Pt 1

VAu653-336

Amy Weber Unpublished 2

Anna Kournikova

VAu590-412

Kournikova Unpublished

VA 1-230-936

Published Works 2004 Pt 1

VA 1-239-766

Kournikova 2

VA 1-239-756

Kournikova 6

VA 1-239-754

Kournikova 9

VA 1-239-763

Kournikova 11

VA 1-239-765

Kournikova 12

VA 1-239-760

Kournikova 14

VA 1-231-147

Kournikova 20

VAu001514818

Anna Kournikova 23

Sofia Vergara

VAu660-266

Sofia Vergara

VAu001514823

Sofia Vergara Unpub 2

Website: posters555.com

Eleniak

VAu692-231	Erika Eleniak
VAu001514820	Erika Eleniak Unpub 2

Tuite

VAu692-302	Gabrielle Tuite
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-230-934	Published Works 2003 Pt 1

Angela Taylor

VA 1-230-934	Published Works 2003 Pt 1
VAu692-306	Angela Taylor

Charisma Carpenter

VA 1-231-030	Published Works 1998 Pt 1
VAu660-265	Charisma Carpenter

Ali Landry	
VAu660-263	Ali Landry
VA 1-230-922	Published Works 1999 Pt 1
VA 1-230-933	Published Works 2000 Pt 1

Sonia Vera	
VAu692-225	Sonia Vera

Jeri Ryan	
VAu660-267	Jeri Ryan

Gena Lee Nolin	
VAu653-334	Gena Nolin (Home)
VA 1-230-933	Published Works 2000 Pt 1
VA 1-230-933	Published Works 2000 Pt 1
VA 1-230-933	Published Works 2000 Pt 1
VA 1-230-937	Published Works 1996 Pt 1
VA 1-230-922	Published Works 1999 Pt 1
VA 1-231-145	Gena Lee Nolin 31

Amy Weber

VA 1-230-923
VAu653-336

Published Works 2002 Pt 1
Amy Weber Unpublished 2

Anna Kournikova

VAu590-412
VA 1-230-936
VA 1-239-766
VA 1-239-756
VA 1-239-754
VA 1-239-763
VA 1-239-765
VA 1-239-760
VA 1-231-147
VA 1-231-146
VAu001514818

Kournikova Unpublished
Published Works 2004 Pt 1
Kournikova 2
Kournikova 6
Kournikova 9
Kournikova 11
Kournikova 12
Kournikova 14
Kournikova 20
Kournikova 21
Anna Kournikova 23

Sofia Vergara

VAu660-266
VAu660-266
VAu660-266
VAu660-266
VAu660-266
VAu001514823

Sofia Vergara
Sofia Vergara
Sofia Vergara
Sofia Vergara
Sofia Vergara
Sofia Vergara Unpub 2

Website: *Iceposter.com*

Daryl Hannah

VAu692-304

VAu692-304

Daryl Hannah

Daryl Hannah

Eleniak

VAu692-231

VAu692-231

VAu692-231

VAu692-231

VAu692-231

VAu001514820

Erika Eleniak

Erika Eleniak

Erika Eleniak

Erika Eleniak

Erika Eleniak

Erika Eleniak Unpub 2

Tuite

VAu692-302

VA 1-239-762

VA 1-239-762

VA 1-239-762

VA 1-239-762

VA 1-239-762

VA 1-230-934

Gabrielle Tuite

Published Works 2003 Pt 2

Published Works 2003 Pt 1

Published Works 2003 Pt 1

VAu692-306

Angela Taylor

Joanna Krupa Missing
VA 1-230-923 Published Works 2002 Pt 1
VA 1-230-923 Published Works 2002 Pt 1
VA 1-230-923 Published Works 2002 Pt 1

Charisma Carpenter
VA 1-231-030 Published Works 1998 Pt 1
VAu660-265 Charisma Carpenter

Ali Landry

VAu660-263 Ali Landry
VA 1-230-922 Published Works 1999 Pt 1
VA 1-230-933 Published Works 2000 Pt 1

Jeri Ryan
VA 1-231-030 Published Works 1998 Pt 1
VAu660-267 Jeri Ryan
VAu660-267 Jeri Ryan
VAu660-267 Jeri Ryan
VAu660-267 Jeri Ryan
VAu660-267 Jeri Ryan

Gena Lee Nolin

VAu653-334	Gena Nolin (Home)
VA 1-230-933	Published Works 2000 Pt 1
VA 1-230-933	Published Works 2000 Pt 1
VA 1-230-933	Published Works 2000 Pt 1
VA 1-230-937	Published Works 1996 Pt 1
VA 1-230-922	Published Works 1999 Pt 1
VA 1-231-145	Gena Lee Nolin 31

Amy Weber

VA 1-230-923	Published Works 2002 Pt 1
VAu653-336	Amy Weber Unpublished 2

Anna Kournikova

VAu590-412	Kournikova Unpublished
VA 1-230-936	Published Works 2004 Pt 1
VA 1-239-766	Kournikova 2
VA 1-239-756	Kournikova 6
VA 1-239-754	Kournikova 9
VA 1-239-763	Kournikova 11
VA 1-239-765	Kournikova 12
VA 1-239-760	Kournikova 14
VA 1-231-147	Kournikova 20
VA 1-231-146	Kournikova 21
VAu001514818	Anna Kournikova 23

Sofia Vergara

VAu660-266	Sofia Vergara
VAu001514823	Sofia Vergara Unpub 2

Website: *idposter.com*

Eleniak

VAu692-231	Erika Eleniak
VAu001514820	Erika Eleniak Unpub 2

Tuite

VAu692-302	Gabrielle Tuite
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-230-934	Published Works 2003 Pt 1

Angela Taylor

VA 1-230-934	Published Works 2003 Pt 1
VAu692-306	Angela Taylor

Alison Eastwood

VA 1-231-031 Published Works 1997 Pt 1

Joanna Krupa

VA 1-230-923 Published Works 2002 Pt 1
VA 1-230-923 Published Works 2002 Pt 1
VA 1-230-923 Published Works 2002 Pt 1

Daisy Fuentes

VAu692-230	Daisy Fuentes
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2

Charisma Carpenter

Ali Landry

VAu660-263	Ali Landry
VA 1-230-922	Published Works 1999 Pt 1
VA 1-231-030	Published Works 1998 Pt 1
VA 1-230-933	Published Works 2000 Pt 1

VA 1-230-933

Published Works 2000 Pt 1

Sonia Vera

VAu692-225	Sonia Vera

Jeri Ryan

VAu660-267	Jeri Ryan
VA 1-231-030	Published Works 1998 Pt 1
VA 1-231-031	Published Works 1997 Pt 1

Gena Lee Nolin

VAu653-334	Gena Nolin (Home)
VA 1-230-933	Published Works 2000 Pt 1
VA 1-230-933	Published Works 2000 Pt 1
VA 1-230-933	Published Works 2000 Pt 1
VA 1-230-937	Published Works 1996 Pt 1
VA 1-230-922	Published Works 1999 Pt 1
VA 1-231-145	Gena Lee Nolin 31

Sofia Vergara

VAu660-266	Sofia Vergara
VAu660-266	Sofia Vergara
VAu660-266	Sofia Vergara

VAu660-266	Sofia Vergara
VAu660-266	Sofia Vergara
VAu001514823	Sofia Vergara Unpub 2

Website: posterthepeople.com

Alison Eastwood

VA 1-231-031	Published Works 1997 Pt 1
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Joanna Krupa

VA 1-230-923	Published Works 2002 Pt 1
VA 1-230-923	Published Works 2002 Pt 1
VA 1-230-923	Published Works 2002 Pt 1

Sofia Vergara

VAu660-266	Sofia Vergara
VAu001514823	Sofia Vergara Unpub 2

Charisma Carpenter

VA 1-231-030	Published Works 1998 Pt 1
VAu660-265	Charisma Carpenter

Jeri Ryan

VAu660-267	Jeri Ryan
VA 1-231-030	Published Works 1998 Pt 1
VA 1-231-031	Published Works 1997 Pt 1

Eleniak

VAu692-231	Erika Eleniak
VAu001514820	Erika Eleniak Unpub 2

Tuite

VAu692-302	Gabrielle Tuite
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-230-934	Published Works 2003 Pt 1

Ali Landry

VAu660-263	Ali Landry
VA 1-230-922	Published Works 1999 Pt 1
VA 1-231-030	Published Works 1998 Pt 1
VA 1-230-933	Published Works 2000 Pt 1
VA 1-230-933	Published Works 2000 Pt 1

Sonia Vera

VAu692-225	Sonia Vera

VAu692-225	Sonia Vera

Daisy Fuentes

VAu692-230	Daisy Fuentes
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2
VA 1-239-762	Published Works 2003 Pt 2

Website: nposter.com

Jeri Ryan

VAu660-267	Jeri Ryan
VA 1-231-030	Published Works 1998 Pt 1
VA 1-231-031	Published Works 1997 Pt 1
VA 1-231-031	Published Works 1997 Pt 1

Sofia Vergara

VAu660-266	Sofia Vergara
VAu001514823	Sofia Vergara Unpub 2

Overall List of Registration Numbers (does not account for multiples within the group)

<u>Name</u>	<u>Reg #</u>
Anna Kournikova 2	VA 1-239-766
Anna Kournikova 6	VA 1-239-756
Anna Kournikova 9	VA 1-239-754
Anna Kournikova 11	VA 1-239-763
Anna Kournikova 12	VA 1-239-765
Anna Kournikova 14	VA 1-239-760
Anna Kournikova 20	VA 1-231-147
Anna Kournikova 21	VA 1-231-146
Kournikova Unpublished	VAu590-412
Anna Kournikova 23	VAu001514818
Published Works 1996 Pt 1	VA 1-230-937
Published Works 1997 Pt 1	VA 1-231-031
Published Works 1998 Pt 1	VA 1-231-030
Published Works 1999 Pt 1	VA 1-230-922
Published Works 2000 Pt 1	VA 1-230-933
Published Works 2001 Pt 1	VA 1-230-935
Published Works 2002 Pt 1	VA 1-230-923
Published Works 2002 Pt 2	VA 1-230-938
Published Works 2003 Pt 1	VA 1-230-934
Published Works 2003 Pt 2	VA 1-239-762
Published Works 2004 Pt 1	VA 1-230-936
Gena Lee Nolin 31	VA 1-231-145
Gena Nolin (Home)	VAu653-334
Amy Weber Unpublished 2	VAu653-336
Charisma Carpenter	VAu660-265
Ali Landry	VAu660-263
Jeri Ryan	VAu660-267
Sofia Vergara	VAu660-266
Sofia Vergara Unpub 2	VAu001514823
Erika Eleniak	VAu692-231
Erika Eleniak Unpub 2	VAu001514820
Daisy Fuentes	VAu692-230
Sonia Vera	VAu692-225
Gabrielle Tuite	VAu692-302
Angela Taylor	VAu692-306
Daryl Hannah	VAu692-304